

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN**

EPIC SYSTEMS CORPORATION, a  
Wisconsin Corporation;  
  
Plaintiff,

v.

TATA CONSULTANCY SERVICES  
LIMITED, an Indian Corporation;  
and TATA AMERICA INTERNATIONAL  
CORPORATION (dba TATA AMERICA), a  
New York Corporation;  
  
Defendants.

Case No. 14-CV-748-wmc

**DECLARATION OF PHILIP D. ROBбен IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT**

Philip D. Robben declares, pursuant to 28 U.S.C. § 1746, that:

1. I am a member of the firm Kelley Drye and Warren LLP, attorneys for Defendants Tata Consultancy Services Limited and Tata America International Corporation ("Tata America"). I make this declaration in support of Defendants' Motion to Dismiss all claims contained in Plaintiff's Amended Complaint. I am admitted to practice in this District.

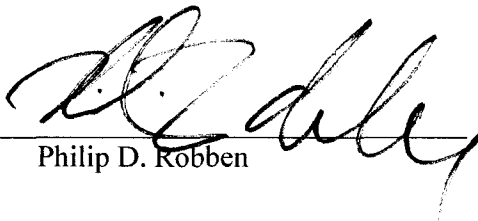
2. A true and correct copy of the Amended Complaint in this action is attached hereto as Exhibit A. This document was previously electronically filed in this proceeding as Docket No. 38.

3. A true and correct copy of a Standard Consulting Agreement, dated August 10, 2005, between Plaintiff Epic Systems Corporation ("Epic") and Tata America International Corp. is attached hereto as Exhibit B. This document was previously electronically filed in this proceeding as Docket No. 7-8.

4. On December 29, 2014, TCS served a subpoena on Philippe Guionnet, the TCS employee and alleged informant that appears to have instigated this lawsuit. In response to the Subpoena, on January 5, 2015, Mr. Guionnet sent e-mails purporting to object to the Subpoena. (Copies of the e-mails Mr. Guionnet sent on January 5 are annexed hereto as Exhibit C.)

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 9, 2015.



Philip D. Robben